

To Whom It May Concern:

GlobeCast North America Incorporated would like to comment upon BT North America, Inc.'s Expedited Petition for Clarification of the Contribution Obligations of Video Distribution Service Providers.

GlobeCast is a video distribution service provider currently subject to Universal Service contributions. We are not a common carrier nor do we provide voice telecommunication services. Our primary business involves uplinking and downlinking of customer provided programming to various satellite transponders. In addition, we provide various broadcast related services including, but not limited to, production, translation, standards conversion, IP services, etc.

GlobeCast contractually charges its customers Universal Service fees where those charges appear necessary under the current rules and regulations. Many of our customers adamantly object to the USF fees and require lengthy explanations from our accounting and legal departments of the nature of those fees and their purpose. GlobeCast has been forced to seek outside counsel to clarify its position with regard to the fees. The paperwork involved in calculating and invoicing USF fees and determining exactly which services require payment of those fees, is voluminous. The cost of compliance has been and continues to be a substantial burden on GlobeCast.

In GlobeCast's opinion, the Congressional intent behind the creation of the Universal Service Fees is not well served by continuing to subject GlobeCast, BT and other similarly situated entities to Universal Service contributions on the basis of revenues derived from such services.

Sincerely,
Brian Sutnick, Esq.
In-House Counsel
GlobeCast North America Incorporated